



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

JUL 11 1990

Ref: 8HWM-FF

Mr. Robert M. Nelson, Jr., Manager
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

RE: Draft Proposed IM/IRA Decision Document
For OU 2 - Surface Water
12 June, 1990

Dear Mr. Nelson:

We are providing you with EPA's comments on DOE's Draft Proposed IM/IRA Decision Document for OU-2, June 12, 1990. The subject document has been designed to serve both DOE's obligations pursuant to the draft Interagency Agreement, and the NEPA process. EPA does not agree that NEPA is applicable to DOE activities pursuant to the IAG or CERCLA. Therefore, EPA will limit its review of the document to those data, analyses, and narrative portions necessary to satisfy the IAG and CERCLA. Since integration of NEPA documentation into IAG submittals may make it difficult for EPA to isolate, review, and comment on those portions required by CERCLA and the IAG, we recommend that future IAG submittals not contain NEPA documentation.

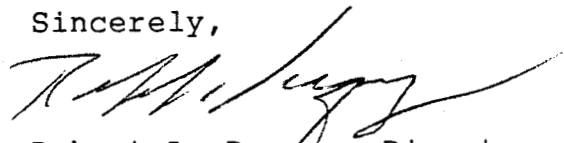
The ability to ensure safety, both for the public and the remediation workers, has been and continues to be a matter of great concern to EPA. All IM/IRA activities involving disturbance of potentially contaminated materials must take into account the potential for increased exposure due to resuspension of contaminants in the atmosphere and possible releases to surface waters. Extensive precautions to prevent such problems were incorporated in the OU 1 (881 Hillside) IM/IRA procedures. These must be applied and possibly augmented for activities at OU 2, based on an evaluation of the activities scheduled, contaminants present, and potential risks.

The ARAR analysis is inconsistent with the revised NCP. EPA previously commented extensively on the revised NCP's effect on potential ARARs for activities related to OU 2 Phase II RFI/RI Workplan. These comments and a revised ARAR analysis must be incorporated into the Proposed Surface Water IM/IRA Decision Document for OU 2.

The role of the proposed IM/IRA within the overall RI/FS process for OU 2 must be clearly understood and stated. The current submittal mentions several stages of treatability testing including bench and field scale. In addition, an apparently extraneous treatability study reporting step is shown in the IAG schedule after the IM/IRA is in place and operating. Any IM/IRA undertaken must be consistent with the final remedy; the avoidance of actions that will preclude or complicate more comprehensive responses is an important part of the IM/IRA selection process and must be reflected in the plan.

You will find attached both EPA generated and PRC (EPA contractor) generated comments. These comments must be addressed as delineated in the revised draft IAG prior to the Proposed Surface Water IM/IRA going to public comment for OU 2. DOE has committed in writing to having the OU 2 IM/IRA treatment process for surface water seeps operational by the end of 1990. EPA expects DOE to fulfill this commitment. As such, EPA expects the Proposed Surface Water IM/IRA for OU 2 to go to public comment at a date designed to meet this commitment, but no later than August 28, 1990. If you or your staff should have questions regarding these comments, or wish to meet to discuss these comments, please contact Martin Hestmark of my staff at (303) 294-1132.

Sincerely,



Robert L. Duprey, Director
Hazardous Waste Management Division

cc: David C. Shelton, CDH
Scott Grace, DOE
Tom Greengard, EG&G
Terry Ruiter, PRC
Peter Ornstein, 8ORC
Martin Hestmark, 8HWM-FF
Noreen Matsuura, CDH